

Exhibit 3

1 FEDERAL TRADE COMMISSION

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3 In the Matter of:)

4 AMAZON.COM, INC.) No. 2123050

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7 Investigational Hearing

8 JAMIL A. GHANI

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11 Federal Trade Commission
Henry M. Jackson Federal Building
12 915 Second Avenue, Suite 2896
Seattle, Washington

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23 DATE: November 16, 2022

24 REPORTED BY: Wade J. Johnson, RPR
CCR No.: 2574

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Ghani

Amazon.com, Inc.

11/16/2022

1 A. There were a couple reasons why it was
2 postponed, one of which was we had had a lot of
3 organizational change on the Prime team, and so there
4 was just people getting up to speed, and it takes time
5 for people to get work done. So we weren't ready.

6 We also, between Llew and I, felt like we
7 needed to have time for his team and my team to work
8 together more productivity and more closely to come
9 forward to the senior leadership team with topics that
10 warranted their time because he and I were, as we
11 discussed in the previous exhibits, largely aligned on
12 this difficult balance, but aligned on working together
13 to try to work through it.

14 Q. So was there a memorandum prepared for the
15 meeting that we're discussing, the meeting with
16 Mr. Clark?

17 A. The ultimate meeting?

18 Q. Yes.

19 A. I believe so, yes.

20 Q. One memorandum or more than one?

21 A. I can't recall exactly when the meeting
22 finally took place. I know there was, at a minimum, a
23 document. We tend to have documents for all of our
24 meetings.

25 Q. Was one of the documents that you discussed at

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1 the meeting with Mr. Clark a later version of the draft
2 memoranda that's attached to Exhibit 14?

3 A. It's a long document, so you'll forgive me.
4 I'm sorry.

5 MR. HALL: Counsel, could I have that
6 question read back.

7 MR. COHEN: Yes.

8 (The previous question was
9 read back.)

10 MR. HALL: I want to caution the witness.

11 I believe that the meeting that's under discussion now
12 is a privileged meeting that included counsel. And so
13 to the extent your answer to this question about the
14 materials supporting that meeting would be a part of
15 those privileged discussions, I would instruct you not
16 to answer.

17 A. So this document was prepared and nearly
18 finished. And to my recollection, we decided not to
19 have the meeting in February. We had a later meeting,
20 the work product of which was not this document.

21 Q. One quick question about this document. The
22 third page or the second page of the memo, 4109.

23 A. 4109, yes.

24 Q. There's a comment where the commenter is JAG1.
25 Are you JAG1?

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1 A. I don't know for certain what my -- my
2 initials are Jamil Asad Ghani. I don't know. I
3 haven't checked my Word settings.

4 Q. Can you spell your middle name, please.

5 A. A-s-a-d.

6 Q. That comment reads, "Unnecessary to state that
7 this that way (sic.) reads accusatory."

8 Have I read that correctly?

9 A. That is what I wrote, yes.

10 Q. And the line you've crossed out previously
11 said Consumer Engagement, CE, has actively tracked
12 these issues since 2016 through the shoppers
13 frustration program and has raised these issues to
14 Prime leadership." Did I read that correctly?

15 A. That is what the line says.

16 Q. What do you believe was accusatory about the
17 line you removed?

18 A. The impression that that line left with me was
19 that Consumer Engagement was raising these concerns to
20 Prime leadership and we weren't doing anything about
21 it, which was not true.

22 Q. Who was the original author or the primary
23 author of this memo if you know?

24 A. I believe it was authored between Nikki
25 Baidwan and Ben Hills, Benjamin Hills.

